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February 16, 2021

Re: Advanced notice of proposed rulemaking on modernizing the Board of Governors of the Federal Reserve System's Community Reinvestment Act regulatory and supervisory framework, Federal Reserve System 12 CFR Part 228, Docket No. R-1723 and RIN 7100-AF94

The National Council on Independent Living (NCIL) is pleased to offer comments on the proposed revisions to the Community Reinvestment Act. NCIL is the longest-running national cross-disability, grassroots organization run by and for people with disabilities. Founded in 1982, NCIL represents thousands of people with disabilities and organizations including Centers for Independent Living (CILs), Statewide Independent Living (SILCs), and other organizations that advocates for the human and civil rights of people with disabilities throughout the United States.

NCIL would like to applaud and support the National Disability Institute's Center for Disability-Inclusive Community Development recommendations, which are located at <https://www.nationaldisabilityinstitute.org/wp-content/uploads/2021/01/ndi-comments-frb-cra-anpr.pdf>. We know from experience of many Centers for Independent Living in communities across the country that many people with disabilities are low-income – often extremely low-income, at or under 30% of Area Median Income – and live in neighborhoods that experience high rates of poverty. In some communities, the rate of disability in low-income neighborhoods can be nearly twice of the rate of the national rate.

NCIL wholeheartedly believes that anti-poverty efforts cannot succeed without being inclusive of people with disabilities. Disability data should be collected by banks, and be part of the scoring process. CRA-funded programs and activities must be inclusive of people with disabilities. To ignore people with disabilities, and to be ignorant of the impact of CRA activities on the population of people with disabilities in target area, will doom CRA initiatives.

Sincerely,

Kelly Buckland